

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

COMMAND MANAGEMENT SERVICES,	)	
INC., an Oregon corporation,	)	
	)	
Plaintiff,	)	
	)	Case No.: 2007 – C – 7017
vs.	)	
	)	
WYNDHAM HOTELS AND RESORTS,	)	
LLC, a Delaware limited liability company,	)	
WYNDHAM HOTEL MANAGEMENT INC.,	)	
a Delaware corporation, WYNDHAM	)	
WORLDWIDE OPERATIONS, INC., a	)	
Delaware corporation, MEHP O'HARE, LLC,	)	
a Delaware limited liability company, MEHP	)	
O'HARE MANAGEMENT, INC., a Delaware	)	
corporation, and WYNDHAM O'HARE,	)	
	)	
Defendants.	)	

**MOTION FOR ENLARGEMENT OF TIME**  
**TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant, WYNDHAM O'HARE, by and through its attorneys, Reno & Zahm LLP, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, hereby moves this Court for an order allowing it an additional twenty-eight (28) days to respond to the Complaint in this matter, and in support thereof, states as follows:

1. The Complaint was filed on December 13, 2007.
2. Wyndham O'Hare was served on December 18, 2007, and therefore, Wyndham O'Hare is required to file an answer or other responsive pleading on or before January 7, 2008.
3. Counsel for Wyndham O'Hare was recently engaged to serve as defense counsel in this matter.

4. Counsel for Wyndham O'Hare are in need of additional time to review the allegations set forth in the Complaint and formulate a response thereto.

5. Accordingly, Wyndham O'Hare seeks an extension of twenty-eight (28) days, to and including, February 4, 2008, to file an answer or other responsive pleading to the Complaint.

6. Counsel for Wyndham O'Hare has not previously sought an enlargement of time to answer or otherwise plead to the Complaint in this case, and makes this initial request based on a *bona fide* need for additional time.

7. This request is made in good faith and will not prejudice the Plaintiff.

WHEREFORE, Defendant, WYNDHAM O'HARE, respectfully requests that this Court enter an order granting an extension to and including February 4, 2008, within which to answer or other responsive pleading may be filed.

Dated this 2<sup>nd</sup> day of January, 2008.

Defendant, WYNDHAM O'HARE, by its  
attorneys, Reno & Zahm LLP

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By: /s/ Ian K. Linnabary  
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